

**U.S. Department of Energy**

**STATE PLAN/MASTER FILE WORKSHEET**

**Grant Number: EE00161, State: NH, Program Year: 2009**

This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

**III.1 Eligible Population**

**III.1.1 General Description**

**Definition of income used to determine eligibility:**

For the purpose of determining client eligibility in the NH Weatherization Assistance Program, the definition of " low income" is as follows:

Income in relation to family size which is at or below 50% (approximately) of the State Median Income or 200% of Federal Poverty Guidelines as determined in accordance with criteria established by the Director of the Office of Management and Budget or which is the basis on which cash assistance payments have been paid during the preceding 12-month period under Titles IV and XVI of the Social Security Act or applicable State or local law.

**Procedures to determine that units weatherized have eligibility documentation:**

Determining Income Eligibility for the New Hampshire Weatherization Assistance Program is a two-step process.

- 1). NH uses a single application for the State's Fuel Assistance Program (FAP) and the Weatherization Program (Wx). Income eligibility is based on the household residing in New Hampshire, household size, and household income level.
- 2). Prior to weatherizing a unit, subgrantees are required to perform income verification as part of the application process to ensure that the applicant is income eligible. Documentation includes, but is not limited to: W-2 forms, paycheck stubs, pension checks or stubs, and public assistance checks. Not all FAP applicants will be eligible for Wx, but their verified income will be used to determine their Wx eligibility. Income information is recorded on the combined Fuel Assistance/Weatherization application. A signature by authorized subgrantee personnel indicates review and eligibility/certification. OEP requires the following information on the weatherization application: applicant's name and address, name of the head of household, total number of people in household, income amounts, income sources, primary heating source, heating fuel and electric supplier. Certified applications remain valid for a twelve month period. A new application must be submitted and certified after twelve months to accurately reflect current household information. The application and eligibility procedures are further detailed in the current New Hampshire Weatherization Administrative Manual.

The period for determining income eligibility is not more than twelve (12) months, nor less than the thirty (30) day period preceding the request for assistance.

The Fuel Assistance/Weatherization application is completed at a subgrantee outreach site or a home visit for those clients who are unable to travel to an outreach site. An interested applicant does not need to accept fuel assistance benefits to participate in the Weatherization Program.

Upon receipt of the certified application (from FAP/Wx or Wx-only application process), a Community Action Agency (CAA) staff person will determine if the home has been weatherized since September 30, 1994. If the home has not been weatherized since this date, it is eligible to be weatherized by the program. Subgrantees will obtain heating fuel consumption data and will complete the Unit Priority Scorecard, which must be included in the client folder.

Compliance with the income eligibility guidelines are reviewed during Office of Energy and Planning (OEP) monitoring visits. Applicant files are reviewed for proper documentation of income, appropriate certification of the application, and approval signatures.

**Definition of children: Below age** 19

**Recommend tribal organization(s) be treated as local applicant?** Yes

**If YES, Recommendation: If NO, statement that assistance to low-income tribe members and other low-income persons is equal:**

There are no federally recognized Native American Tribes in New Hampshire.

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The Weatherization Program prohibits discrimination based on race, color, religion, sex, age, national origin, marital or familial status, sexual orientation or physical or mental disability. Therefore, low income members of a Native American Tribe will receive weatherization benefits equivalent to those benefits provided to other eligible low income persons.

#### III.1.2 Selection of Areas to Be Served

By subcontracting with NH's Community Action Agencies, the Office of Energy and Planning (OEP) is able to ensure that eligible residents throughout the state are served by the Weatherization Assistance Program. Their presence as a recognized, established resource in the community allows for greater outreach to all communities throughout the state.

#### III.1.3 Priorities

To assure delivery of weatherization services to the most vulnerable households, subgrantees are required to use the Unit Priority Scorecard. The exception to this priority system is flexibility to utilize up to 20% of annual production goals as a means to promote cost effective scheduling of work. All applications are carefully reviewed to ensure that the elderly, persons with disabilities, and children under age six are priorities that are addressed. Examples of additional priorities are:

- A. Priority for "High Cost of Heating": Heating fuel consumption data is required information for any site to be weatherized. A high cost of heating may indicate an opportunity for significant energy savings and therefore a higher priority weatherization opportunity.
- B. Priority for "Time on Waiting List": When other priority factors are equal, a client who has been on the waiting list for a longer period of time should receive weatherization services prior to those that have been on the list for a shorter period of time.
- C. Priority for "Elderly": Priority is given to identifying and serving dwelling units of the low income elderly. An elderly person is one who is sixty years of age or older.
- D. Priority for "Persons with Disabilities": Priority is given to those households identified as dwelling units whose occupant(s) are persons with disabilities.
- E. Priority for Households with Young Children: Priority is given to identifying and serving dwelling units where infants reside. An infant is defined as a child under the age of six (6) years old.
- F. Opportunity for collaboration: Priority is given when opportunities exist to use funds from additional funding sources, which will in turn stretch the Weatherization funds further and allow the program to serve more households.

#### III.2 Climatic Conditions

Climate conditions vary considerably from north to south across the state of New Hampshire. These conditions and differences are measured in heating degree days (HDD) using a base of 65 degrees F. The range of values and the average value used in each subgrantee service area is shown below. Climate data is based on the 30 year Climate norms available from the National Weather Service.

Service Area = NH County	HDD Range	HDD Value used
Belknap/Merrimack	7,000-8,000	7488
Rockingham	6,500-7,300	6739
Hillsborough	6,500-7,400	7386
Cheshire/Sullivan	6,800-7,600	7475
Strafford	6,600-7,800	6748
Grafton/Carroll/Coos	7,600-9,500	8975

Climatic variances are taken into account by using different climate data files when using the NEAT audit to determine weatherization measures to be installed into eligible units. These variations are also accounted for in the fiscal allocation formula for subgrantees.

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#### III.3 Weatherization Work

##### III.3.1 Type of Work to Be Done

Once an applicant has been determined income eligible for the Weatherization Assistance Program, an energy audit is performed on the dwelling unit. The audit includes diagnostic testing which is performed by an OEP certified energy auditor. Based upon the energy audit findings, approved subcontractors or weatherization crew members will return to install the required weatherization measures. The priority of the weatherization measures customarily installed are: measures designed to reduce general heat waste, wall and/or attic insulation where appropriate, evaluations of and some repair to heating systems in owner occupied houses, and under certain circumstances, grossly inefficient, unsafe, or inoperable heating systems may be replaced (dependent upon funding) in owner occupied houses.

**Typical work completed on site built homes includes:**

- health and safety testing and measures
- general heat waste
- blower door directed air sealing
- water heater system treatment
- furnace system tune up
- lighting
- client education
- insulate uninsulated ceilings
- insulate ducts outside the thermal boundary
- insulate uninsulated walls
- insulate partially insulated ceilings
- insulate box sills
- insulate foundation and/or ducts
- refrigerator replacement
- other necessary repairs (limited to \$500)
- minor air sealing

**Typical work completed on mobile homes includes:**

- health and safety testing and measures
- general heat waste
- blower door directed air sealing
- water heater system treatment
- furnace system tune up
- lighting
- client education
- insulate floors
- insulate partially insulated walls
- insulate partially insulated ceilings
- refrigerator replacement
- other necessary repairs (limited to \$500)
- minor air sealing

While DOE does allow for refrigerator replacement, the subgrantees have established program with the electric utilities which funds the replacement and recycling of refrigerators.

**Sources of labor:** In keeping with one of the goals of ARRA -- "To preserve and create jobs and promote economic recovery" -- OEP aims to help provide opportunities for new jobs and workforce development through implementation of its Weatherization Assistance Program. However, ARRA does give "preference to activities that can be started and completed expeditiously". In addition, it calls for state's effective use of funds, giving "priority to using such funds for the most cost effective efficiency activities." In procuring labor for weatherization activities, OEP will strive to balance these goals and priorities.

OEP and subgrantees will:

- i. Post new employee positions and subcontractor opportunities both internally and externally until filled.
- ii. Act as equal opportunity employers.

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iii. Encourage salaries or hourly wages plus benefits that constitute a livable wage for a family of four defined as two working parents with two young children as reported by the Carsey Institute Issue Brief #10.

iv. Maintain existing relationships with established and trained subcontractors that have delivered efficient and cost effective services.

#### III.3.2 Energy Audit Procedures

NH Weatherization Assistance Program utilizes advanced energy audit procedures authorized by DOE. During the energy audit, the auditor will ascertain that there are no significant or substantial reasons not to weatherize the dwelling, such as significant Health & Safety problems, as specified in the current Policy and Procedures Manual. All health and safety issues must be resolved prior to, or in conjunction with, the installation of weatherization measures.

During the three year grant period, OEP subgrantees will utilize a priority list and the newly enhanced version of NEAT and MHEA for jobs funded solely by DOE Wx. For jobs which are collaborated with the electric and/or natural gas utility, subgrantees will utilize TREAT. Approximately 90% of the jobs are co-funded by the electric and/or natural gas utilities. This method is described in the NH Weatherization Standards Manual and was reviewed and approved by Alex Moore of then DNR International on 10/25/2005.

<u>Unit Types</u>	<u>Audit Procedures and Dates Most Recently Approved by DOE</u>
Single-family	NEAT/TREAT and priority list - per NH Weatherization Standards
Multi-family	NEAT/TREAT and priority list - per NH Weatherization Standards
Mobile Home	MHEA/TREAT and priority list - per NH Weatherization Standards

#### III.3.3 Final Inspection

Final inspections on one hundred percent (100%) of all units completed are required to be performed by certified Wxn Energy Auditors. No less than ten percent (10%) of these units will be monitored by OEP's Weatherization Program Manager.

OEP technical field monitoring includes: monitoring of health and safety procedures, cost-effectiveness and compliance with the technical requirements of the program. OEP staff will utilize the blower door, infrared scanning equipment, combustion efficiency testing equipment, digital cameras and other equipment deemed necessary to provide comprehensive monitoring of completed units. The subgrantees understand that the purpose of the program is to increase the energy efficiency of dwellings owned or occupied by low-income persons, to reduce their total residential energy expenditures and, if possible, improve their health and safety. A limit has been imposed on health and safety expenditures to insure the program remains cost-effective and to maintain the primary goal of energy efficiency.

#### III.3.4 Assessment of Effectiveness

OEP will use the DOE approved formula for calculating energy savings attributable to weatherization. This same method will be used to calculate savings attributable to weatherization work performed by each subgrantee.

OEP will send a survey to each weatherization client after job completion to solicit feedback on program effectiveness. This survey assesses satisfaction with general program implementation and delivery of services - it is not intended to collect information for energy savings calculations.

In addition to collecting client feedback, OEP will monitor subgrantees and contractors to evaluate program effectiveness. Observations of technical and program issues will be used to develop the T&TA activity plan that will enhance skills of energy auditors and subcontractors.

OEP will seek to hire an independent third party to perform a statewide program evaluation.

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#### III.4 Health and Safety

OEP and its subgrantees recognize that the primary function of the Weatherization Program is to increase the energy efficiency of dwellings owned or occupied by low-income persons. Further, the program's goals are to reduce total residential energy expenditures and, if possible, improve health and safety. A limit has been imposed on health and safety expenditures to ensure the program remains cost-effective and to maintain the primary goal of energy efficiency.

NH's Weatherization Standards address required issues in DOE's Health and Safety Guidance Program Notice 02-5 and also incorporate experience gained in mitigating health and safety issues, information obtained from other professionals in the field and from OEP's participation on the DOE Health and Safety Committee.

The NH Weatherization Program will limit health and safety related expenditures to not more than ten percent (10%) of the subgrantee contracted program costs (excluding administrative, liability insurance, and financial audit costs) budgeted for the fiscal year. This limit is sufficient to remedy most health and safety concerns in conjunction with the installation of weatherization measures. OEP will allow an average health and safety cost of \$500 in materials and labor to be spent on any dwelling unit for Health and Safety related remedies. These costs will not be included as part of the overall job average.

The New Hampshire Weatherization Program Health and Safety Standards (Plan) may be found in section 3000 of the current NH Weatherization Standards which is on file at DOE PMC. The Health and Safety Requirements address: worker health and safety; health and safety procedures; deferral of Weatherization services; lead safe weatherization; client health and safety; moisture assessment and repairs; building tightness limits and indoor air quality; CO and smoke alarms; blower door safety; and electrical safety.

Please refer to the Health and Safety section of the current Standards for additional details.

In all instances, the certified energy auditor, subgrantee weatherization crew and/or sub-contractors must evaluate on-site conditions to determine if any potential health and safety hazard should be remedied, referred to other agencies, result in partial weatherization services, or cause weatherization services to be deferred. The Weatherization program is not an abatement or remediation program and Weatherization funds shall not be used for those purposes.

#### HEALTH AND SAFETY PLAN:

##### A. Grantee Health and Safety

Health and Safety funds are to remedy pre-existing health and safety hazards in order to properly install weatherization measures, or to prevent potential hazards created in the installation of weatherization materials. These funds are to be expended by subgrantees in direct weatherization activities.

##### B. Crew and/or Contractor Health and Safety

Local agencies must comply with NH Department of Labor and federal Occupational Safety and Health Administration (OSHA) requirements in all weatherization activities. Costs for local agencies to comply with OSHA requirements may be charged under health and safety, tools and equipment, or incidental repairs as appropriate and as approved in subgrantee's management plan.

Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate OSHA requirements. Some of these requirements include, but are not limited to: respirator protection, techniques for safely lifting heavy objects, safe operation of power tools used in general repair and construction, electrical equipment safety, ladder safety, and general worker protection. OSHA standards should be consulted for further details. Other useful information may be included on Material Safety Data Sheets that identify potential health risks and describe the proper use, handling, and storage of a wide variety of materials, including some common weatherization materials. They also suggest personal protective equipment and address first aid measures.

##### C. Client Health and Safety

Energy auditors and crews/subcontractors are required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks. Before beginning work on the residence, the energy auditor must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants. When a client's health is fragile and/or

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the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities.

Weatherization services can be provided in a manner that minimizes risk to workers and clients. Although the Weatherization Assistance Program does not provide all the solutions, awareness of potential hazards is essential to providing quality services. A list of the more common hazards and the preferred approach to them are discussed in Section D, below. Other energy-related hazards should be considered on a case-by-case basis.

#### D. Potential Hazard Considerations

DOE reviews the hazards, remediation materials, and weatherization costs allowed under §440.18(c)(15). At a minimum, state health and safety plans should consider the following potential hazards. The plans should describe the approaches that agency crews and contractors will take to determine if the potential hazard should be remedied, referred to other agencies, result in partial weatherization services, or cause weatherization services not to be provided.

1. **Biologicals.** Removal of mold, odors, viruses, bacteria, unsanitary (including raw sewage) conditions, and rotting wood is not a Weatherization responsibility; however workers frequently encounter these conditions. DOE funds may be used if these conditions must be remedied to allow effective weatherization work and/or to assure the immediate or future health of workers and clients. Particular attention should be paid to the calculated House Tightening Limit (HTL) when conducting air sealing measures in dwellings with these problems. If necessary, weatherization services may need to be delayed until the problem can be remedied or referred to another agency that can take remedial action.

2. **Combustion Appliances and Combustion Gases.** Costs of tools or equipment needed to test for dangerous concentrations of combustion products in the living space should be included in the "Tools and Equipment Purchase" cost category. Testing of all vented combustion appliances in every home for carbon monoxide is required. This consists of checking carbon monoxide levels in the flue/vent of vented appliances and near the exhaust of unvented cooking appliances; examining draft-ability of flues, start-up spillage at flues, and adequacy of combustion air; and testing for fuel leaks. **WARNING:** the presence of an unvented combustion (natural gas, propane, kerosene, etc) space heaters is cause for immediate "Deferral of Weatherization Services." Delivery of weatherization services **MUST BE DEFERRED** until such appliances are removed, disconnected, or the client provides a signed letter acknowledging the severe potential hazards associated with use of such appliances, and releases The Weatherization Program from liability associated with its use. Combustion appliances that should be tested include furnaces, boilers, space heaters, gas fireplaces, cook stoves, and water heaters.

3. **Fire Hazards.** Combustion appliances and their associated venting systems can also present potential fire hazards. Energy auditors must identify inadequate clearances between combustion appliances (including venting systems) and combustible materials. Such situations must be remedied if associated costs are within the scope of Health and Safety expenditures. Additional information can be found in this manual in Section II on Solid Fuel Burning Appliances.

4. **Occupant's Existing Health Problems.** Subgrantees should be aware that some individuals' health problems could be exacerbated by weatherization activities. For example, some clients can be sensitive to dust generated during the installation of cellulose insulation. Information regarding occupant health should be gathered from the client at the initial audit and recorded on the BTDIS. The installation of certain weatherization measures may be dependent on the client's health.

#### 5. Indoor Air Quality

a. **Asbestos.** General asbestos removal is not approved as a health and safety weatherization cost. Major asbestos problems should be referred to other programs or the Environmental Protection Agency (EPA). Where subgrantees work on large heating and distribution systems, including related piping, asbestos removal may be necessary. Removal is allowed to the extent that energy savings resulting from the measure will provide a cost-effective savings-to-investment ratio. This would normally be true with work done on large, multifamily heating systems. Where permitted by code or EPA regulations, less costly measures that fall short of asbestos removal, such as encapsulation, may be used. Removal and replacement of asbestos siding for purposes of wall insulation is permissible if allowed by state and local codes.

b. **Radon.** Where there is a previously identified radon problem, work that would exacerbate this problem (i.e. air sealing) should be limited. Radon abatement is not an allowable activity under the weatherization program. However, those costs

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associated with taking precautions in a dwelling known to have radon problems are allowable weatherization expenditures. These costs are allowable if an energy audit indicates that weatherization techniques would help in radon remediation. Major radon problems should be referred to the appropriate local environmental organization or agency for mitigation or abatement.

c. Formaldehyde and Volatile Organic Compounds (VOCs). Formaldehyde vapors may be slowly released by some new carpets, waferboard, plywood, etc. VOCs are also emitted by some household cleaning agents. Caution should be taken when selecting air tightness limits in dwellings with VOC problems.

6. Lead Paint - Per WPN 08-6, OEP will seek to train Weatherization auditors, crews and contractors according to the DOE LSW curriculum, keeping in mind that the 2010 EPA final rule will be followed for compliance. OEP may solicit neighboring states to apply for additional training funds as a region to obtain the services of an LSW expert to provide the training. OEP will monitor compliance with LSW through regularly scheduled monitoring visits and in-process inspections whenever feasible. Instances of non-compliance will be handled individually as they arise through the normal course of required corrective actions specified in the monitoring report.

Subgrantees have been notified of the change in client notification forms and are providing those new forms as appropriate and required.

Subgrantees have been trained and are informed with regards to personal protective equipment per OSHA standards.

LSW training will reinforce protection of client health and safety. OEP will require documentation of LSW in the client file and will monitor compliance through the course of normal monitoring and file reviews.

This policy includes providing clients with the pamphlet "Renovate Right". In addition agency building technicians are trained on how to work in a safe lead environment.

New employees are trained on safe work practices within the first twelve months of employment to protect employees from the hazards of lead during weatherization work, to limit worker exposure to airborne lead during weatherization, and to ensure that employers such as CAA's communicate the hazards of all hazardous chemicals in the workplace by

1. Labeling all containers of hazardous chemicals,
2. Having a written hazard communication program
3. Providing material safety data sheets, including on lead
4. Training workers on safe chemical practices during normal and emergency actions.

Agencies' responsibilities:

1. Provide the Lead Paint form to all clients and landlords.
2. After assessment, do not disturb areas where lead based paint is known or assumed to exist.
3. Protect occupants' belongings from contamination.
4. Prevent unauthorized entry to work site until work is completed.
5. Cover surfaces below work area to contain dust and debris and prevent release of leaded dust.
6. Use suitable work practices to prevent the creation, spread, inhalation, and ingestion of lead dust.
7. Conduct interim controls to reduce the production of lead dust or perform necessary weatherization work.
8. Arrange for clearance testing when necessary.
9. Properly manage and dispose of contaminated protective clothing and other debris.
10. Wash hands and face; be aware of personal hygiene when leaving the workplace.
11. Use of these safe work practices on all weatherization projects.
12. When working in areas known to contain lead, develop Action levels to permissible exposure limit.

Agencies will adhere to the following guidelines when determining the need for lead safe work practices:

- 1) Ask if a resident of the home has been identified as being lead poisoned while living in the home. If the answer is yes, proceed with the inspection but coordinate with the local health department before disturbing any paint.
- 2) Presume that lead-based paint is present unless one of the following conditions apply:
  - a) The residence was built after 1977; or
  - b) The owner or occupant provides the analyst with a copy of an inspection report signed by a lead inspector or risk assessor licensed by that indicates no lead-based paint is present;

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- 3) If lead-based paint is present or presumed to be present, assess whether the paint is seriously deteriorated (i.e. that a workman's presence just walking around the residence is enough to stir up lead-based paint laden dust residues); and
- 4) If the lead-based paint is seriously deteriorated, defer all weatherization work, document your decision, and recommend that children in the home get a blood lead test. Contact the local health department for guidance.

Community Action Agencies shall use the following lead-safe work practices whenever known or presumed lead-based paint is disturbed. The Building Technician Crew Leader is responsible for ensuring that these work practices are followed:

- 1) General: When any lead-based paint is disturbed:
  - a) Tell the occupants to stay out of the work area
  - b) Ensure that workers can wash their hands and face when leaving work area
  - c) Ensure that workers do not smoke, eat, drink, chew tobacco or gum, or apply cosmetics in the work area
  - d) If desired wear a respirator or dust mask;
  - e) Obtain a Ground-Fault Circuit Interrupter (GFCI) if electrical equipment will be used
- 2) Do not use any of the following methods to remove the paint:
  - a) Open-flame burning or torching;
  - b) Machine sanding or grinding without high-efficiency particulate air (HEPA) local exhaust control
  - c) Abrasive blasting without HEPA local exhaust control;
  - d) Heat guns at temperatures above 1100°F or charring the paint
  - e) Dry sanding or dry scraping except:
    - (i) In conjunction with heat guns (low temperature)
    - (ii) Within 1.0 ft of electrical outlets; or
    - (iii) When treating defective paint spots totaling no more than:
    - (iv) 2 sq. ft. in any one interior room or space or 10% of a small component; or
    - (v) 20 sq. ft. on exterior surfaces; and
    - (vi) Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous chemical under OSHA as applicable to the work.
  - f) Lightly spray the paint with water before disturbing it and try keep it wet and use wet sanding/scraping methods whenever disturbing the paint;
  - g) If equipment is going to be reused, wash it thoroughly before leaving residence
  - h) Dispose of all lead-based paint, debris, coveralls, and plastic covering in regular trash; and
  - i) Dispose of all water contaminated with lead-based paint in a sanitary sewer system.
- 3) Minor Paint Disturbances: When less than 2 square feet per room or 10% of an interior component of lead-based paint is disturbed inside or less than 20 square feet of lead-based paint is disturbed outside:
  - a) Follow general requirements described in item 1) above
  - b) Tape a plastic bag or sheeting on the horizontal surface below the paint to collect paint chips and any dust that may be formed; and
  - c) After work is done, wipe the surface with a baby wipe or towel.
- 4) Exterior Paint Disturbances: To be used when more than 20 square feet of exterior lead-based paint is disturbed. Generally, removing siding from a wall is presumed to disturb more than 20 square feet of lead-based paint unless it is known beforehand that deteriorated lead-based paint and lead dust is not behind the siding.
  - a) Follow general requirements described in item 1) above
  - b) String barrier tape saying "WARNING" or "DANGER" or "DO NOT ENTER" at least five feet beyond area where lead-based paint will be disturbed
  - c) Post OSHA warning signs near the exterior work so it can be easily read from 20 feet away from the edge of the exterior worksite.
  - d) Ensure that everyone who enters the work area wears plastic coveralls, shoe covers, and hair covering and removes them when leaving the work area;



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- e) Seal any windows, doors, dryer exhausts or other openings in the work area
  - f) Remove or cover any equipment in the work area with plastic sheeting
  - g) Place six-mil thick plastic sheeting on wall below the paint to be disturbed and on the eight feet from the wall in a manner that it captures the water (15 feet if disturbed paint is on the second floor);
  - h) Place a 2" x 4" board or similar device along the outer edges of the plastic to capture water
  - i) Wash off any siding that is removed
  - j) Repair any deteriorated paint and fix cause of deterioration
  - k) Remove plastic, clean up any debris, and dispose in trash so that no deteriorated paint and visible paint remains.
- 5) Interior Areas:
- a) Follow general requirements described in item 1) above
  - b) Ensure that the occupant has received the EPA Pamphlet Renovate Right
  - c) Post OSHA warning signs at the main and secondary entryways to the building.
  - d) Ensure that everyone who enters the work area wears plastic coveralls, shoe covers, and hair covering and removes them when leaving the work area;
  - e) Remove throw rugs and other furniture that can be removed.
  - f) Cover remaining furniture and horizontal surfaces with plastic sheeting extending the sheeting on the floor up the wall about 18";
  - g) Seal any air supply or return into the work area
  - h) Repair any deteriorated paint and fix cause of deterioration
  - i) Remove plastic, clean-up any debris and dispose in trash so that no deteriorated paint and visible paint remains;
7. Building Structure - Building rehabilitation is beyond the scope of the Weatherization Assistance Program; however, homes in poor structural condition are frequently encountered. Dwellings whose structural integrity is in question should be referred to the other programs such as HUD's HOME program. Weatherization services may need to be delayed until the dwelling can be made safe for crews and occupants. Incidental repairs necessary for the effective installation, performance, or protection of weatherization materials are allowed. Examples of these limited repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater.
8. Electrical Issues - The two primary energy-related health and safety electrical concerns are insulating homes that contain knob-and-tube wiring and identifying overloaded electrical circuits. Older electric wiring, primarily knob-and-tube wiring, located in a wall cavity or exposed on an attic floor was intended by code to have free air movement for that would cool the wire when it is carrying an electric current. Laboratory tests have shown that retrofitting thermal insulation around damaged knob&tube electric wiring can cause it to overheat, resulting in a fire hazard. The October 21, 1988 Weatherization policy places responsibility on the authority having jurisdiction to ensure that insulation around knob-and-tube wiring conforms with applicable codes in jurisdictions where the work is being performed. In 1987, Section 324 (article 324-4) of the National Electrical Code (NEC) was revised to prohibit the use of concealed knob-and-tube wiring "in the hollow spaces of walls, ceilings and attics when such spaces are insulated by loose or rolled insulating material." While the NEC is a national code, it is not administered and enforced nationally. Building codes are administered on the state, county, or local level but are usually based on one of the national model codes (e.g., BOCA, CABO, UBC), which reference the NEC for electrical requirements. State or local jurisdictions can amend the model code they have adopted to meet specific local concerns. For example, Washington, Oregon, and two local jurisdictions in Ohio amended NEC 324-4 to allow loose or rolled thermal insulation in spaces containing knob-and-tube wiring providing specific conditions are met. Serious electrical hazards exist when gross overloads are present. Should auditors and crews find such existing problems, they should notify the owner. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps, or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. The problem should also be noted in the client file. To the extent that these problems prevent adequate weatherization, the subgrantee should consider repairing them on a case-by-case basis.
9. Refrigerant Issues. Weatherization Program Notice 00-05 requires that as part of any refrigerator replacement program, agencies are required to reclaim refrigerant per the Clean Air Act 1990, section 608, as amended by 40 CFR 82, 5/14/93. The appliance vendor, demanufacturing center, or other entity recovering the refrigerant must possess EPA-approved section 608 type I or universal certification. States should ensure they have appropriate protocols in place

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that comply with all standards relating to the disposal of the existing appliances.

10. Other Code Compliance Issues - It is the state's responsibility to ensure that all weatherization-related work conform with applicable codes in jurisdictions where the work is being performed.

#### E. Deferral Standards

The decision to defer weatherization work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. Subgrantees, which includes crews and contractors, are expected to pursue reasonable options on behalf of the client, including referrals, and to use good judgment in dealing with difficult situations. Subgrantees should use "Weatherization Program Suspension of Services" form (Attachment P in the current Policy and Procedures Manual) for such situations. The form must be filled out completely, including the client's name and address, dates of the audit/assessment and when the client was informed, a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Deferral conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
3. The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
4. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities.
5. Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
6. Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
7. The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
8. The extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
9. In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.

### III.5 Rental Procedures

The benefits of weatherization of rental housing units are intended and expected to accrue to the tenants. The eligibility of a client that lives in a rented dwelling unit rather than an owner occupied unit will be determined in the same manner and in accordance with the program requirements outlined in the current Administrative Manual. A signed Landlord-Tenant Agreement is an additional requirement in the eligibility process for renters.

Compliance to ensure that the owner/agent's permission has been obtained shall be accomplished by the mandatory use of the NH Wxn Landlord-Tenant Agreement prior to the start of weatherization on any rental property. The NH Wxn Landlord-Tenant Agreement must be signed by the appropriate parties and a copy retained in subgrantee client files. This agreement contains a one year rent protection feature which states that tenants will not be subjected to rent increases unless those increases are related to matters other than the weatherization work performed. Tenants are encouraged to contact the appropriate CAA if perceived violations to this agreement occur.

Entire buildings, including common areas and non-income eligible units may be weatherized if a minimum percentage of the units in the building are eligible. In duplexes and four-unit buildings, fifty percent (50%) of the units must be eligible for the program before the entire building may be weatherized. For all other multi-family buildings, if a minimum of sixty-six percent (66%) of the units are eligible for the program, the entire building may be weatherized.

Information on other issues relevant to special housing situations may be found in the current NH Weatherization Program

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Each unit must be audited and evaluated separately for purposes of weatherization. The Building Information and Test Data Information Sheet and client job folder must accurately identify the material and expense attributable to each unit.

#### **III.6 Program Management**

##### **III.6.1 Overview**

OEP delivers an integrated array of federal programs including the US Department of Energy's State Energy Program (SEP) and Weatherization Program and the Low Income Home Energy Assistance Program (LIHEAP).

OEP is a part of the Executive Branch of New Hampshire's State Government.

Currently, OEP subcontracts with six New Hampshire Community Action Agencies (CAAs) who are responsible for operating and delivering weatherization services at the local level. OEP's working relationship with the CAAs allows for better coordination with other social service programs or organizations that eligible households may not be aware of. The NH Community Action Agencies have been delivering the Weatherization program at the local level for over thirty years. Individually, many of the directors, energy auditors, crew people and contractors have twenty years or more experience in the Weatherization field. The community action agencies have successfully partnered with electric and natural gas utility efficiency programs, municipal grants, and other federally funded programs to deliver the most services possible to the Weatherization clients. Those partnerships, particularly in the past six years, has resulted in a consistent surpassing of program goals and positive energy savings in all households.

##### **III.6.2 Administrative Expenditure Limits**

In accordance with 440.18(d), OEP does not retain more than 5% of DOE grant funds for administrative purposes. OEP distributes 5% of our overall DOE grant funds to the six subgrantees for administrative purposes.

OEP also provides an additional 5% administrative funds to subgrantees, as allowed under 440.18(d), to subgrantee that receive less than \$350,000 in total DOE Weatherization Program funding. OEP utilizes the following procedure to appropriate the additional administrative funding:

1. To determine the administrative allotment, OEP subtracts 10% from the total DOE grant award and the T&TA grant award amount. 5% is for OEP administrative funds and 5% is for subgrantee administrative funds. The remainder represents the program funds to be allocated to the subgrantees.
2. Subgrantees who receive less than \$350,000 are eligible for an additional 5% of the grant for administrative funds. To determine who is eligible, OEP subtracts 5% from the remainder, which represents the additional pool of administrative funding that can be awarded to qualifying subgrantees. The funds from this additional pool are allocated by a formula to all subgrantees to determine the amount they would receive if they qualified for the funds. Those subgrantees that do not qualify for their allocation because they surpass the \$350,000 threshold do not receive the additional administrative funds. The amount not awarded to non-qualifying agencies becomes part of program funds to be allocated to all subgrantees.
3. All administrative and program monies are obligated to the subgrantees based upon an allocation formula.

##### **III.6.3 Monitoring Approach**

OEP staff perform Management and Technical Monitoring reviews to assess program effectiveness and delivery, and compliance with DOE federal regulations and New Hampshire State regulations.

OEP closely monitors subgrantee performance and compares monthly performance data to benchmarks for the program such as the Job Average. OEP works closely with subgrantees who face performance problems and assists in developing corrective actions to improve their performance.

Each subgrantee's technical work will be monitored on a regular basis. Program monitoring will occur on an annual basis. Additional monitoring visits will be conducted more frequently if OEP determines extra assistance is required. Flexibility will

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be retained to allow frequent visits as needed, to resolve particular problems or to facilitate specific training objectives. Exit interviews are conducted at the end of a program or technical monitoring visit.

Written monitoring reports are provided to the subgrantee Executive Director, Program Director and/or Fiscal Officer within thirty (30) days. These reports outline specific corrective actions required. A response describing the corrective action taken must be received by OEP within thirty (30) days of the date of the report. In the case of technical or fiscal monitoring, when OEP receives no response, OEP reserves the right to disallow the cost of the discrepancy, or in the case of technical monitoring the entire cost of the unit may be disallowed. The disallowed cost will be either refunded to OEP by check or deducted from the next monthly reimbursement. Procedures have been established to resolve any issues that arise. Please refer to the current NH Weatherization Standards and the Administrative Manual for further details.

Monitoring will include, but is not limited to, the following:

A. Program Monitoring: OEP utilizes the Management Monitoring Instrument as defined by DOE and expanded by OEP to establish subgrantee's program delivery and management effectiveness. The annual management assessment performed by OEP for each subgrantee is the most efficient analysis of the overall management effort.

B. Fiscal Monitoring: OEP Fiscal Office also utilizes the Management Monitoring Instrument. The Fiscal Office will perform subgrantee site visits to review accounting procedures and to verify the accuracy of financial reports at least annually and more if deemed necessary. Fiscal technical assistance is provided to subgrantees to ensure complete understanding of the information requested on the various reports and compliance with federal and state regulations.

C. Technical Monitoring: Final inspections of one hundred percent (100%) of completed units for both the DOE Wx and LIHEAP Wx programs are required to be performed by certified Wx Energy Auditors. Not less than ten percent (10%) of these units will then be monitored by OEP's Weatherization Program Manager. OEP will monitor health and safety procedures, cost-effectiveness and compliance with the technical requirements of the program.

As part of the monitoring inspections, OEP staff will utilize blower door, infrared scanning equipment, combustion efficiency testing equipment, digital cameras and other equipment necessary to provide comprehensive monitoring of completed units.

D. Client Feedback: OEP will also use verbal and/or written feedback from clients to evaluate the effectiveness of the statewide program.

#### III.6.4 Training and Technical Assistance Approach

OEP assesses the training needs of subgrantees as part of the on-going monitoring and evaluation process. Due to regular monitoring visits, OEP staff can ascertain when additional training and technical assistance is necessary for an individual subgrantee or for all subgrantees on a state wide basis.

OEP retains a portion of the T&TA funding for training needs and for functions related to those training needs which are of statewide interest. This reduces unnecessary duplication, provides a uniformity of instruction and maximizes cost effectiveness. The primary objective of this approach is to administer and coordinate the training needs statewide while maintaining strong technical competence in the NH Wx Program. Attendance at such training sessions is mandatory.

As outlined in the current Policy and Procedures Manual, all auditors are required to obtain NH Wxn Program certification as soon as possible following their hiring. OEP does not accept audits by uncertified energy auditors. Initial certification as a Wx Energy Auditor involves successful completion of both a written and field exam.

OEP measures the performance of subgrantees against their own goals and previous performance levels. Comparisons made against other agencies and state averages can provide a benchmark, but are not used in assessing T&TA activities. If any subgrantee or individual is performing in less than an optimal manner, OEP will attempt to identify and offer appropriate training and guidance. Progress will be closely monitored by OEP's staff to assure the individual or agency has resolved the issues in question.

A portion of the state's T&TA funds will be used for monitoring efforts and when necessary to purchase equipment needed to fulfill monitoring obligations.

OEP assesses T&TA activities submitted by subgrantees as a supplement to their Management Plan and as part of our technical assistance management oversight efforts. As funds permit, OEP will allocate a portion of the T&TA funds to subgrantees based on an agreed upon allocation formula. OEP also recognizes there are exceptions to the allocation of subgrantees' T&TA funds especially when unique considerations need to be given to individual energy auditors/subgrantees.

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To assist with the monitoring and technical assistance plans, OEP will survey all NH Wx recipients as their valuable input will assist in the program analysis about the effectiveness of the weatherization services performed. OEP will compile the responses and provide the cumulative data to all subgrantees.

**III.6.5 Energy Crisis Plan**

OEP is a member of the State's emergency response team, which utilizes a State Energy Emergency Response Plan (SEERP), written and maintained by OEP. DOE Weatherization funds are not used for either the maintenance of the SEERP or to actually respond to an energy crisis.